

Law Office of G. Anthony Long
P.O. Box 504970, Beach Road
San Jose, Saipan, MP 96950
Telephone: (670) 235-5802
Facsimile: (670) 235-4801

Attorney for Mrs. Kim Sung Eun, Mr. Kim Ki Sung
and KSK Corporation, A CNMI Corporation

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

**LI YING HUA, LI ZHENG ZHE, and XU
JING JI,**

Plaintiffs,

vs.

**JUNG JIN CORP., a CNMI corporation,
ASIA ENTERPRISES, INC., a CNMI
corporation, PARK HWA SUN, KIM
HANG KWON, KSK CORPORATION, a
CNMI corporation, and KIM KI SUNG,**

Defendants.

Case No. CV 05-00019

STATEMENT OF DISPUTED
FACTS

Date: July 17, 2008

Time: 9:00 a.m.

The disputed material facts in this case include but are not limited to the following:

1. Whether KSK is a successor employer for any of the plaintiffs?
2. Whether the assets taken possession of by KSK constitutes substantially all or a substantial portion of the original defendants assets?
3. Whether any of the plaintiffs performed services for Welcome Poker, Welcome Laundry,

or Welcome Market?

4. Whether Shanty II is the continuation of the original defendants operation of Welcome Poker, Welcome Laundry or Welcome Market or any other business operated by the original defendants?

5. Whether Kim Ki Sung loaned \$100,000.00 to any of the original defendants?

6. Whether KSK possessed notice of plaintiffs claim when Jung Jin Corporation executed the promissory note?

7. Whether KSK possessed sufficient notice of plaintiffs' FLSA claims for successor liability purposes when it took possession of the Welcome assets?

8. Whether KSK taking possession of the Welcome assets constitutes a fraudulent conveyance?

9. Whether Kim Hang Kwon possesses any assets?

10. Whether Park Hwa Sun possesses any assets?

11. Whether plaintiffs can collect on the judgment in Korea from Kim Hang Kwon?

12. Whether plaintiffs can collect on the judgment in Korea from park Hwa Sun?

13. Whether KSK is the alter ego of Kim Ki Sung?

14. Whether Kim Sung Eun is involved in the operation of KSK?

15. Whether KSK has successor liability for any of the plaintiffs?

16. Whether Kim Ki Sung has a close personal relationship with Kim Hang Kwon?

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By: _____/s/_____
G. Anthony Long

